

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MOHAMMED THANI A.T. AL THANI,

Plaintiff,

-against-

ALAN J. HANKE, IOLO GLOBAL LLC, and
JOHN DOES 1-100

Defendants.

Case No.: 20-cv-4765 (JPC)

**DECLARATION OF MATTHEW DUCHARME IN SUPPORT OF PLAINTIFF'S
SUPPLEMENTAL MEMORANDUM OF LAW IN OPPOSITION TO DEFENDANT
AMY ROY-HAEGER'S MOTION TO DISMISS**

I, MATTHEW DUCHARME, pursuant to 28 U.S.C. § 1746, hereby swear under penalty of perjury that the following is true and correct to the best of my personal knowledge:

1. I am a senior associate at Hogan Lovells US LLP, 390 Madison Avenue, New York, NY 10017, which is counsel to Plaintiff Mohammed Thani A.T. Al Thani ("Plaintiff") in the above-captioned action (the "Action"). I am duly admitted to practice law in this Court and in the State of New York.

2. I submit this declaration in support of Plaintiff's Supplemental Memorandum of Law in Opposition to Amy Roy-Haeger's Motion to Dismiss. I am familiar with the facts and circumstances stated herein.

3. Attached hereto as **Exhibit A** is a true and accurate copy of excerpts from the transcript of the deposition of Amy Roy-Haeger, which was conducted virtually on December 3, 2021.

4. Attached hereto as **Exhibit B** is a true and accurate copy of an email chain between Alan Hanke, Steve Papi, and Amy Roy-Haeger, dated January 4, 2020, and bearing the subject line “Re: Fw: Urgent.”

5. Attached hereto as **Exhibit C** is a true and accurate copy of an email chain between Alan Hanke, Steve Papi, and Amy Roy-Haeger, dated January 6, 2020, and bearing the subject line “Fw: Meeting.”

6. Attached hereto as **Exhibit D** is a true and accurate copy of an email chain between Alan Hanke, Amy Roy-Haeger, and Victor Sigmond, with the first one dated November 22, 2019, and bearing the subject line “Fwd: Alan.”

7. Attached hereto as **Exhibit E** is a true and accurate copy of a Loan Agreement between Alan Hanke and Craig Hubner, signed by Alan Hanke and Amy Roy-Haeger on behalf of Craig Hubner, and dated March 28, 2019, which has had passport numbers and bank account information redacted.

8. Attached hereto as **Exhibit F** is a true and accurate copy of an email chain between Alan Hanke, Craig Hubner,¹ and Amy Roy-Haeger, dated June 26, 2020, and bearing the subject line “Re: 26 June 2020 – Outstanding Loan.”

9. Attached hereto as **Exhibit G** is a true and accurate copy of an email chain between Alan Hanke, Craig Hubner, and Amy Roy-Haeger, dated June 24, 2020, and bearing the subject line “Letter.”

¹ Craig Hubner’s name displays as “Carl Brown” on emails.

10. Attached hereto as **Exhibit H** is a true and accurate copy of an email chain between Alan Hanke, Craig Hubner, and Amy Roy-Haeger, dated June 22, 2020, and bearing the subject line “Re: 22 June 2020 – Outstanding Loan.”

11. Attached hereto as **Exhibit I** is a true and accurate copy of copy-pasted WhatsApp chats between Amy Roy-Haeger and Alan Hanke, which Amy Roy-Haeger produced to Plaintiff, and which begins with a chat dated January 21, 2019, which has had passport numbers and bank account information redacted.

12. Attached hereto as **Exhibit J** is a true and accurate copy of an email chain between Lance Baraker, Alan Hanke, and Amy Roy-Haeger, dated December 6, 2019, and bearing the subject line “Re: Transaction Update.”

13. Attached hereto as **Exhibit K** is a true and accurate copy of an email chain between Michael Martino and Amy Roy-Haeger, dated May 17, 2019, and bearing the subject line “RE: Commissioner Peirce Answers Your Most Pressing Questions at RCA Symposium.”

14. Attached hereto as **Exhibit L** is a true and accurate copy of screenshots of text messages between Michael Martino and Amy Roy-Haeger, produced by Amy Roy-Haeger, with the first message bearing the date February 6, 2020.

Executed on January 7, 2022.

/s/ Matthew Ducharme
Matthew Ducharme